



California Regional Water Quality Control Board

San Diego Region



Linda S. Adams
Secretary for
Environmental Protection

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<http://www.waterboards.ca.gov/sandiego>

2009 DEC 29 P 10:36

December 30, 2009

In reply refer to:

Place ID: 255223 fmelbourn

Catherine Hagan
Staff Counsel III
Office of Chief Counsel
State Water Resources Control Board
9174 Sky Park Court, Suite 100
San Diego, California 92123-4340

Evidence & Policy Statements

ACL Complaint No. R9-2009-0089 Against the County of San Diego

Dear Mrs. Hagan:

The Prosecution Team submits the following information in accordance with the Hearing Procedures for Administrative Civil Liability (ACL) Complaint No. R9-2009-0089:

Evidence

1. All materials previously distributed to the Designated Parties, including, but not limited to ACL Complaint No. R9-2009-0089, its technical analysis and all attachments thereto;
2. County Comprehensive Annual Financial Report (Pages 19 – 34, Dated December 10, 2008);
3. Order No. R9-2001-0001;
4. County 2006-07 JURMP Annual Report (Section 7, Dated January 31, 2008);
5. County JURMP for Order No. R9-2001-0001 (Section 7, Dated February 21, 2002);
6. Regional Board Letter (Dated September 28, 2007);
7. County DPW Director's Letter of Instruction (Dated September 15, 2005);
8. Addendum No. 2 to Order No. R9-2007-0001;
9. County Stormwater Standards Manual (Dated August 5, 2003); and
10. Notice of Violation No. R9-2008-0164 (Dated December 23, 2008).

Legal and Technical Arguments or Analysis

This information has been provided to the Designated Parties with ACL Complaint No. R9-2009-0089 and related documents.

Witnesses

The following may be used as Prosecution Team witnesses:

Name	Subject	Estimated Testimony Time	Qualifications
Eric Becker	Technical and administrative analysis	Five minutes	Water Resource Control Engineer, California Regional Water Quality Control Board, San Diego Region
Laura Drabandt	Legal and administrative analysis	Ten minutes	Staff Counsel, Office of Enforcement, California State Water Resources Control Board
Jeremy Haas	Technical and administrative analysis	Five minutes	Senior Environmental Scientist, California Regional Water Quality Control Board, San Diego Region
Frank Melbourn	Technical and administrative analysis	Fifteen minutes	Water Resource Control Engineer, California Regional Water Quality Control Board, San Diego Region
Laurie Walsh	Technical and administrative analysis	Five minutes	Water Resource Control Engineer, California Regional Water Quality Control Board, San Diego Region

In the subject line of any response, please include the requested "In reply refer to:" information located in the heading of this letter. For questions pertaining to the subject matter, please contact Frank Melbourn at (858) 467-2973 or fmelbourn@waterboards.ca.gov.

Respectfully,



JEREMY C. HAAS
Senior Environmental Scientist
Compliance Assurance Unit

JCH:dmb:ftm

- Enclosures:
1. County Comprehensive Annual Financial Report
 2. Order No. R9-2001-0001
 3. County 2006-07 JURMP Annual Report (Section 7)
 4. County JURMP for Order No. R9-2001-0001 (Section 7)
 5. Regional Board Letter
 6. County DPW Director's Letter of Instruction
 7. Addendum No. 2 to Order No. R9-2007-0001
 8. County Stormwater Standards Manual

California Environmental Protection Agency

9. Notice of Violation No. R9-2008-0164

cc via e-mail: Sara Agahi, County of San Diego, sara.agahi@sdcounty.ca.gov
David Boyers, Office of Enforcement, dboyers@waterboards.ca.gov
Laura Drabandt, Office of Enforcement, ldrabandt@waterboards.ca.gov
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Chandra Wallar, County of San Diego, chandra.wallar@sdcounty.ca.gov
Laurie Walsh, RWQCB, San Diego, lwalsh@waterboards.ca.gov

Order No.	ACL Complaint No. R9-
File No.	2009-0089
GeoTracker No.	10-5016
NPDES No.	
CIWQS Place ID	CAS108758
WDID	255223
Reg. Measure No.	9 0000510S1
Party ID	372074
Person ID	39617